

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

RADCLIFF INVESTMENTS LIMITED,
ROTHSCHILD TRUST GUERNSEY LIMITED,
and ROBERT D. SALEM,

Defendants.

Adv. Pro. No. 10-04517 (SMB)

**NOTICE OF MOTION TO DISMISS
THE FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Rothschild Trust Guernsey Limited's Motion to Dismiss the First Amended Complaint, upon the Declaration of Jeff E. Butler in Support of Rothschild Trust Guernsey Limited's Motion to Dismiss the First Amended Complaint, dated May 1, 2017, and upon all prior pleadings and proceedings herein, Defendant Rothschild Trust Guernsey Limited will move this Court for an order dismissing with prejudice the First Amended Complaint filed by Plaintiff Irving H. Picard in this adversary proceeding on March 31, 2017, pursuant to Rule 12(b)(6) of the Federal Rules

of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy
Procedure, and granting such other and further relief as the Court deems just and proper.

Dated: May 1, 2017
New York, New York.

Respectfully submitted,

S/ Jeff E. Butler

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